

EXHIBIT A

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February 20, 2019

Josh Weisser
Corporate Distressed
Contrarian Capital Management, L.L.C.
41 West Putnam Avenue, Suite 425
Greenwich, CT 06830

Matter #: 07246-00002A
Invoice Number: 101-0000083884
Responsible Attorney: Daniel Salinas

GE Litigation

For Professional Services through January 31, 2019 in connection with representation of Contrarian Capital Management, L.L.C. (the "Client"), on behalf of certain managed funds and accounts, in connection with the research and analysis of limited issues related to the Client's holding of bonds issued by Petr leos de Venezuela, S.A., as set forth in the Scope of Engagement section of the Engagement Letter dated August 8, 2017 executed by and between Daniel Salinas-Serrano, Partner of Quinn Emanuel Urquhart & Sullivan, LLP and Gina N. Scianni, General Counsel of Contrarian Capital Management, L.L.C.

Fees	\$488,744.00
Expenses	<u>\$17.64</u>
Total Due This Invoice	<u>\$488,761.64</u>

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Statement Detail

Date	Timekeeper	Description	Hours
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Not Claimed

01/03/19	AD5	Review and revise motion for summary judgment in lieu of complaint for bond enforcement; review and revise draft motion for summary judgment in lieu of complaint based for GE Note enforcement.	4.90
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01/03/19	VN1	Correspond with working group re GE enforcement; review past correspondence re same; draft correspondence re ACP/AWP correspond with working group re same; review issues re ACP/AWP	5.10
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01/04/19	DS2	Review and revise latest drafts of GE Summary Judgment and related filings; Correspondence with team re same; Correspondence with client re same.	5.50
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01/04/19	AD5	Review and revise supporting affidavits for motion for summary judgment in lieu of complaint for GE Note enforcement; integrate acceleration notices into motion; emails with VN regarding revisions to motion.	6.80
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01/04/19	SAB	Emails with QE team re: various issues; review documents and draft pleadings.	0.50
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Not Claimed

01/05/19	DS2	Correspondence with team re ACP/AWP issues relevant to GE action; Review and revise most recent versions of ACP/AWP papers; Correspondence with team re same.	3.00
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01/05/19	SAB	Emails with QE team re: various issues.	0.30
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01/05/19	AD5	Review and revise motion for ACP/AWP re enforcement of GE Notes; prepare email to DSS, VN regarding motion affirmations.	2.20
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01/05/19	VN1	Correspond with D. Salinas re ACP/AWP issue; correspond with working group re attorney affidavit in support of ACP/AWP research re same.	3.40
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Date	Timekeeper	Description	Hours
01/06/19	AD5	Review and revise motion for ACP/AWP re enforcement of GE Notes; email with VN regarding attorney affidavit.	0.90
01/06/19	DH3	Analyze GE credit documents and send email to QE team regarding replacement of Agent.	1.30
01/06/19	DS2	Discussion with V. Noskov re replacement of GE Notes and Credit Agreement administrative agents; Review and revise response to client question re same; Correspondence with client re same; Work on draft ACP/AWP under GE instruments; Discussion with team re same; Call with V. Noskov re same; Correspondence with client re GE affidavit; Correspondence with team re same.	4.00
01/06/19	VN1	Research re assignment/agent mechanics; correspond with working group re same; review and analyze client questions re various open items; correspond with working group re same.	5.10
01/07/19	DS2	Review client correspondence re categories of documents needed from GE; Discussion with team re same and need of those documents for summary judgment and ACP/AWP Correspondence with team re status of ACP/AWP and summary judgment papers.	2.00

Not Claimed

01/07/19	VN1	Research re assignment/agent mechanics; correspond with working group re same; review and analyze client questions re various open items; correspond with working group re same.	7.80
01/07/19	SAB	Emails and calls with QE team re: various issues.	0.40
01/07/19	AD5	Review and revise motion for pre judgment attachment; review and revise attorney ACP/AWP ACP/AWP review and revise summary judgment in lieu of complaint to enforce GE notes and supporting affidavit; revise chart tracking exhibits to motion for summary judgment in lieu of complaint; emails with DSS and NV regarding revisions.	8.80
01/08/19	AD5	Emails with DSS and NV re questions regarding ACP/AWP ACP/AWP ACP/AWP ACP/AWP	3.80
01/08/19	DS2	Review client email re ACP/AWP Discussion with team re same; Review relevant memos re same; Correspondence answering client questions re same;	3.00

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Date	Timekeeper	Description	Hours
		Discussion with team re latest versions of summary judgment and attachment documents; Review [REDACTED] ACP/AWP [REDACTED] ACP/AWP	
01/08/19	SAB	Emails with QE team and clients re: various issues.	0.40
01/08/19	VN1	Draft attachment MOL; review and revise GE Affidavit; correspond with working group re same; review issues re enforcement; correspond with working group re same.	6.80
01/09/19	AD5	Review and revise fact affidavit for note enforcement action; review and revise [REDACTED] ACP/AWP [REDACTED] emails with NV re fact affidavit and [REDACTED] ACP/AWP [REDACTED] review documents from Contrarian re enforcement action.	7.50
01/09/19	DS2	Review draft GE Assignment and Acceptance Agreement; Review Contrarian edits to same; Correspondence with V. Noskov re same; Correspondence with client re calls to discuss litigation strategy and status; Correspondence with V. Noskov re outstanding issues and status of litigation papers	2.50
01/09/19	VN1	Correspond with client re strategy call; correspond with working group re open issues; draft strategy summary; correspond re same with working group; revise GE affidavit; correspond with working group and client re same; draft [REDACTED] ACP/AWP [REDACTED] correspond with working group re same.	11.00
01/10/19	AD5	Review and revise fact affidavit for notes enforcement action; TC with DSS, SAB, NV regarding enforcement action workflow; review and analyze documents provided by Contrarian with respect to 2015 note; emails with DSS, SAB, NV regarding 2015 notes documents; legal research regarding [REDACTED] ACP/AWP [REDACTED]	4.80
01/10/19	SAB	Call with QE team; emails with QE team and review various draft pleadings and supporting documents.	0.80
01/10/19	DS2	Review latest draft of [REDACTED] ACP/AWP [REDACTED] incorporating team edits; Revise same; Correspondence with team re same; Call with team re litigation strategy; Review latest version of GE assignment agreement; Review and revise draft executive memo outlining litigation strategy; Discussion with team re same; Correspondence with client re same.	5.00
01/10/19	VN1	Telephone conference with working group re litigation strategy; analyze issues re same; correspond with working group re same; review assignment papers; correspond with working group re same; review proxy papers; draft enforcement summary for client; correspond with working	7.90

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Date	Timekeeper	Description	Hours
		group re same.	
01/11/19	AD5	Legal research regarding [REDACTED] ACP/AWP [REDACTED] emails with SAB, [REDACTED] ACP/AWP [REDACTED] DSS, VN regarding [REDACTED] ACP/AWP [REDACTED] TC with DSS, SAB, RIW, NV regarding [REDACTED] ACP/AWP [REDACTED] coordinate outreach to library for Wall Street Journal article; TC with DSS, SAB, NV, J. Weisser. X. Song, M. Ginnings; emails with DSS, SAB, and NV regarding outstanding documents for enforcement action.	7.80
01/11/19	SAB	Call with clients re: strategy; research and analysis of strategy issues; emails with QE team re: various issues.	3.60
01/11/19	DS2	Review and revise draft affidavits; Discussions with team re litigation strategy; Call with S. Broome re proceeding under order to show cause; Discussion with V. Noskov re same; Analyze and discuss other strategic considerations re best way to seek [REDACTED] ACP/AWP [REDACTED]	5.50
01/11/19	VN1	Telephone conference with working group re litigation strategy; analyze issues re same; correspond with working group re same.	2.40
01/12/19	AD5	Emails with DSS, SB, VN, M. Ginnings, X. Song, J. Weisser re [REDACTED] ACP/AWP [REDACTED] and pre motion conference regarding assignment issues.	1.50
01/12/19	SAB	Emails with clients and QE team re: various strategic issues; review draft documents.	0.70
01/13/19	DS2	Correspondence with client re [REDACTED] ACP/AWP [REDACTED] Correspondence with team re same; Discussion with team re status of summary judgment and [REDACTED] ACP/AWP [REDACTED]	1.00
01/13/19	VN1	Revise enforcement memorandum.	4.20
01/14/19	AD5	TC with DSS, SB, NV regarding enforcement strategy for GE notes; prepare agenda for internal strategy TC; prepare email for Contrarian summarizing research questions; review and revise [REDACTED] ACP/AWP [REDACTED] legal research on [REDACTED] ACP/AWP [REDACTED]	7.70
01/14/19	DS2	Further review and revision of draft filings; Prepare answers to client questions; Discussions with team re same; Analyze prior cases [REDACTED] ACP/AWP [REDACTED] have been granted; Call with team re same and additional strategic considerations for filing motion for summary judgment and for [REDACTED] ACP/AWP [REDACTED]	6.00

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Date	Timekeeper	Description	Hours
01/14/19	SAB	Call with QE team re: various strategic issues; emails with QE team and client.	0.90
01/14/19	VN1	Telephone conference re strategy and update; review research re enforcement; revise strategy memorandum; review Crystallex docket; correspond with working group re strategy.	9.20
01/15/19	AD5	Legal research on cases [REDACTED] ACP/AWP [REDACTED] prepare email summary of cases [REDACTED] ACP/AWP [REDACTED] ACP/AWP [REDACTED]	5.10
01/15/19	DS2	Review and revise latest drafts of [REDACTED] ACP/AWP [REDACTED] and summary judgment filings.	2.00
01/15/19	VN1	Correspond with managing clerk's office re disclosure requirements; research re same; review and revise [REDACTED] ACP/AWP [REDACTED] review issues re [REDACTED] ACP/AWP [REDACTED] review issues re client questions re assignment; review GE affidavit drafts.	8.50
01/15/19	SAB	Emails with QE team re: various issues; analysis of [REDACTED] ACP/AWP [REDACTED] cases.	0.90
01/16/19	AD5	Review and revise GE affidavit and memorandum of law in support of motion for summary judgment; emails with DSS, SB, NV; revise email summary of cases [REDACTED] ACP/AWP [REDACTED] legal research on cases [REDACTED] ACP/AWP [REDACTED] ACP/AWP [REDACTED] ACP/AWP [REDACTED]	4.50
Not Claimed			
01/16/19	SAB	Analysis of various strategy issues and relevant cases; emails with QE team re: same.	1.60
01/16/19	VN1	Draft enforcement memorandum; research re same; draft strategy update to client; correspond with same re same; revise 3213 papers; correspond with working group re same; correspond with S. Broome re confidentiality issues; correspond with working group re [REDACTED] ACP/AWP [REDACTED] and [REDACTED] ACP/AWP [REDACTED] papers.	10.80
01/17/19	AD5	Prepare OSC in support of [REDACTED] ACP/AWP [REDACTED] prepare [REDACTED] ACP/AWP [REDACTED] legal research regarding [REDACTED] ACP/AWP [REDACTED] review edits to GE affidavit and summarize response.	7.50
01/17/19	VN1	Draft enforcement memorandum; research re same; correspond with working group re same; revise [REDACTED] ACP/AWP [REDACTED] papers; correspond with working group re same; correspond	10.80

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Date	Timekeeper	Description	Hours
		with client re outstanding items; review GE Affidavit; correspond with A. Deknatel re OSC papers; discuss ACP/AWP issues with working group; telephone conference with client re anonymity issues.	
01/18/19	AD5	TC with DSS, VN, SAB regarding enforcement papers; review and revise ACP/AWP legal research on ACP/AWP review and revise ACP/AWP emails with VN regarding ACP/AWP	7.80
Not Claimed			
01/18/19	SAB	Internal OE call; calls with clients; analysis and emails re various strategic issues.	1.90
01/18/19	VN1	Review correspondence re ACP/AWP analyze issues re 3213 motions; research re enforcement memorandum; draft same; review issues re ACP/AWP correspond with opposing counsel re GE transaction; telephone conference with working group re transaction; revise GE affidavit per same; correspond with working group re ACP/AWP	13.10
01/19/19	AD5	Prepare summary of credit agreement analysis; prepare email regarding ACP/AWP and enforcement issues regarding credit agreement; legal research on credit agreement enforcement; emails with NV regarding credit agreement analysis.	6.50
01/19/19	VN1	Draft ACP/AWP research re same; correspond with working group re same; analyze issues re 3213; correspond with A. Deknatel re same; correspond with counterparty re GE affidavits; research re 3213 issues.	9.50
01/20/19	AD5	Emails with NV regarding analysis of credit agreement; review and revise ACP/AWP	5.80
01/20/19	DS2	Analyze ACP/AWP	3.50

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Date	Timekeeper	Description	Hours
		Correspondence with team re same; Review S. Broome edits to [REDACTED] ACP/AWP Correspondence with team re filing logistics.	
01/20/19	SAB	Revise [REDACTED] ACP/AWP emails with QE team re: various issues.	3.30
01/20/19	VN1	Review comments to [REDACTED] ACP/AWP correspond with working group re same; correspond with working group re 3213 issues; research re same.	4.10
01/21/19	AD5	TCs with DSS, SAB, NV regarding enforcement strategy regarding assessment of credit agreement enforcement risks; email summary of prior analysis and communications regarding enforcement of credit agreement; prepare revised affidavits for GE affiant separated by agreement; review and revise memorandum of law for [REDACTED] ACP/AWP legal research regarding credit agreement enforcement by CPLR 3213; emails with NV regarding legal research.	9.20
01/21/19	DS2	Analyze [REDACTED] ACP/AWP [REDACTED] ACP/AWP Call with team re same; Further discussion and correspondence with V. Noskov re preserving [REDACTED] ACP/AWP Correspondence with client re same; Correspondence with GE deal parties re [REDACTED] ACP/AWP Correspondence with client re same; Team call re litigation strategy; Client call re same.	8.50
01/21/19	SAB	Calls and emails with QE team re: various issues; review draft pleadings and supporting documents.	0.90
01/21/19	VN1	Revise [REDACTED] ACP/AWP research re same; review documents re same; correspond with working group re same; research re 3213 issues; correspond with working group re same; telephone conference with working group re same; review GE Affidavit drafts; correspond with working group re same; telephone conference with client re [REDACTED] ACP/AWP telephone conference with client re [REDACTED] ACP/AWP	12.40
01/22/19	VN1	Revise enforcement memorandum; correspond with working group re same; revise [REDACTED] ACP/AWP correspond with working group and client re same; review materials re enforcement by other creditors; review transactional documents; correspond with counterparty re same; revise GE Affidavits; telephone conference with opposing counsel re conflicts/confidentiality issues; draft 3213 papers; research re same.	11.50
01/22/19	AD5	Review and revise memorandum of law for 3213 enforcement	10.50

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Date	Timekeeper	Description	Hours
		action, ACP/AWP ACP/AWP prepare email summary for client regarding status of enforcement papers; review and revise memorandum of law re ACP/AWP review ancillary documents for GE transaction; review register prepared by GE; emails with NV regarding memorandum of law and enforcement memorandum; emails coordinating room reservation for strategy meeting and printing of case documents.	
01/22/19	DS2	Review and revise latest ACP/AWP ACP/AWP Discussions with V. Noskov re same; Review and revise latest drafts of GE affidavits; Correspondence with client re same; Discussion with V. Noskov re ACP/AWP Correspondence with client re same; Review latest iterations of assignment agreements; Prepare list of open issues heading to closing and litigation	7.00
01/22/19	SAB	Emails with QE team re: various strategy issues; review draft documents; revise ACP/AWP prepare for client meeting.	3.50
01/23/19	DS2	Review and revise latest drafts of GE filings; Review and revise consolidated strategy memo for clients; Prepare for client meeting; Travel to NY for client meeting; Meet client re litigation strategy; Further review and revision of litigation filings; Call with S. Broome re possibility of a NY co-counsel; Call with M. Zauderer re possible role as co-counsel.	12.00
01/23/19	VN1	Office conference with client re enforcement strategy; revise enforcement memorandum re same; correspond with client re various outstanding transaction issues; correspond with opposing counsel re GE Affidavit issues; draft language re same; correspond with working group re same; telephone conference with working group re same; telephone conference with working group re transactional issues; correspond with A. Deknatel re outstanding pleadings; review same; correspond with working group re undertaking logistics.	13.10
01/23/19	AD5	Conf. with DSS, VN, SAB, J. Weissner, X. Song regarding litigation strategy for GE notes; emails with VN and DSS regarding agreement provisions on ACP/AWP challenges; review and revise memorandum for litigation strategy; coordinate printing for litigation strategy meeting; coordinate room reservation and lunch for litigation strategy meeting; emails with VN and DSS regarding preparation of affidavits in support of enforcement action and memorandum of law preparation; legal research regarding ACP/AWP	10.80

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Date	Timekeeper	Description	Hours
01/23/19	SAB	Calls and emails with QE team re: various issues; prepare for and attend meeting with clients; emails regarding and with former commercial division judges; calls with M. Zauderer.	6.50
01/24/19	DS2	Discussion with V. Noskov re documents needed from GE; Correspondence with client re same; Further revisions to summary judgment and attachment filings; Discussion with team re same; Correspondence with client re same	10.50

Not Claimed

01/24/19	AD5	Review and revise ACP/AWP review and revise attorney affidavits in support of 3213 enforcement action; prepare notice and proposed orders for enforcement action; citations for ACP/AWP TCs to NY Department of State; emails to M. Zauderer regarding enforcement papers; emails with VN regarding enforcement logistics and case management.	9.80
01/24/19	SAB	Emails with QE team re: various strategic issues; review documents for filing; emails with Zauderer.	1.40
01/25/19	DS2	Discussions with team, co-counsel and client re ACP/AWP ACP/AWP Discussion with client and GE team re closing documents including GE affidavit; Call with co-counsel re litigation strategy and ACP/AWP Discussion with team re same; ACP/AWP ACP/AWP	7.50
01/25/19	VN1	Attend closing calls re GE transaction; review materials re same; correspond with working group re same; correspond with counterparty re same; revise pleadings re ACP/AWP revise 3213 papers; correspond with co-counsel re same; telephone conference with same re same.	11.20
01/25/19	CG3	Meet with team re: case background and tasks; compile articles cited as potential exhibits to motions for summary judgment.	1.40
01/25/19	AD5	TC with DSS, SAB, VN, M. Zauderer, J. Cohen; prepare internal agenda for TC with M. Zauderer; review and revise ACP/AWP from M. Zauderer; review and revise ACP/AWP review	10.20

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Date	Timekeeper	Description	Hours
		ACP/AWP conf. with VN and CG regarding enforcement logistics; emails with P. Smith regarding RJL, summons, enforcement logistics; TCs to NY Department of State regarding corporate status of PDVSA and Petroleos.	
01/25/19	SAB	Call with Zauderer and QE team re: strategic issues; review documents for filing.	2.70
01/26/19	DS2	ACP/AWP ACP/AWP Discussion with team re same; Correspondence with client re same; Discussion with team and co-counsel re ACP/AWP ACP/AWP	2.00
01/26/19	VN1	Revise ACP/AWP revise 3213 pleadings; correspond with working group re same.	10.60
01/26/19	AD5	Review and revise memorandums of law, notice, summons, and RJL for GE note enforcement action and GE credit agreement enforcement action; legal research ACP/AWP ACP/AWP ACP/AWP emails with VN, DSS, and SAB regarding preparation of enforcement papers.	8.20
01/26/19	SAB	Emails with QE team and Zauderer re: various strategic issues; review papers.	0.90
01/27/19	DS2	ACP/AWP ACP/AWP Call with client re same; Discussion with team re same and plans to ACP/AWP	2.00
01/27/19	VN1	Telephone conference with working group and client re ACP/AWP analyze issues re ACP/AWP papers; correspond with working group re same; revise pleadings re same.	5.20
01/27/19	SAB	Call with clients and Peter Harrell re: ACP/AWP revise ACP/AWP emails with QE team and Zauderer re: various strategic issues.	1.80
01/27/19	AD5	TC with SAB, DSS, VN, M. Ginnings, X. Song, J. Weissner, P. Heller re ; prepare email regarding call summary; review and revise summons, notice for GE note enforcement.	2.80
01/28/19	DS2	Review ACP/AWP ACP/AWP ACP/AWP Correspondence with team re same; Study new ACP/AWP	7.00

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		ACP/AWP Discussion with D. Pulecio re same; Correspondence with team re same; Correspondence with client re same; Correspondence with P. Harrell re same.	
01/28/19	VN1	Telephone conference with co-counsel re form of pleadings and case status; review materials re ACP/AWP ACP/AWP ACP/AWP	4.90
01/28/19	AD5	Review and revise exhibit document folders and tracker; conform enforcement papers to Contrarian feedback.	1.50
01/28/19	DPB	Review, analyze and correspond with QE team and clients regarding ACP/AWP	2.50
01/28/19	SAB	ACP/AWP emails with QE team re: various issues; revise papers.	1.50
01/29/19	AD5	TC with DSS, NV, P. Harrell, J. Weisser, M. Ginnings, X. Song re Venezuela sanctions and PDVSA; email and TC with J. Cohen regarding GE note enforcement and preparing ACP/AWP ACP/AWP and hearing talking points.	1.20
01/29/19	DPB	Review, analyze and correspond with QE team and clients regarding ACP/AWP	1.10
01/29/19	DS2	ACP/AWP ACP/AWP ACP/AWP Further analysis of ACP/AWP and implications for litigation strategy; Discussion with team re same; Call with client re same.	5.00
01/29/19	VN1	Telephone conference with working group and client re ACP/AWP ACP/AWP correspond with working group re same; correspond with co-counsel re potential filing; review correspondence re same; telephone conference with S. Broome re ACP/AWP Review proposed order; correspond with working group re same; review and revise ACP/AWP correspond with working group re same; research re ACP/AWP	10.90
01/29/19	SAB	Emails with QE team re: various strategy issues; ACP/AWP ACP/AWP review revisions to pleadings.	0.60
01/30/19	VN1	Correspond with working group and client re ACP/AWP ACP/AWP correspond with working group re same; review 3213 papers.	5.90
01/30/19	SAB	Emails with QE team re: various issues.	0.30
01/30/19	DS2	ACP/AWP Further analysis of impact of ACP/AWP ACP/AWP Discussions with V. Noskov re same	3.00

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Date	Timekeeper	Description	Hours
01/31/19	AD5	Emails with VN re ACP/AWP	0.40
Not Claimed			
01/31/19	DS2	ACP/AWP ACP/AWP Discussions with D. Pulecio re same; Meeting with P. Harrell re same; Discussion with team re ACP/AWP Discussions with partners and contacts re ACP/AWP ACP/AWP Discussion with V. Noskov re ACP/AWP ACP/AWP Correspondence with client re same; Reach out to contacts to ACP/AWP ACP/AWP Correspondence with client re same.	7.00
Total Hours			561.20

Fee Summary

Attorneys	Init.	Title	Hours	Rate	Amount
Stephen A. Broome	SAB	Partner	35.40	1,000.00	35,400.00
Daniel Salinas	DS2	Partner	126.30	1,000.00	126,300.00
Daniel Holzman	DH3	Counsel	1.50	930.00	1,395.00
Victor Noskov	VN1	Associate	234.50	840.00	196,980.00
Daniel Pulecio-Boek	DPB	Associate	3.60	835.00	3,006.00
Anna Deknatel	AD5	Associate	158.50	790.00	125,215.00
Case Assistants	Init.	Title	Hours	Rate	Amount
Caitlin Garvey	CG3	Paralegal	1.40	320.00	448.00

Expense Summary

Description	Amount
Local business travel	17.16
Document Reproduction	0.24 per page based on market not cost 0.48
Total Expenses	\$17.64

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Current Invoice Summary

Matter Name : GE Litigation

Matter #: 07246-00002A

Bill Date: February 20, 2019

Invoice Number: 101-

0000083884

Total Fees.....\$488,744.00

Expenses.....\$17.64

Total Due this Invoice.....\$488,761.64

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March 21, 2019

Josh Weisser
Corporate Distressed
Contrarian Capital Management, L.L.C.
41 West Putnam Avenue, Suite 425
Greenwich, CT 06830

Matter #: 07246-00002A
Invoice Number: 101-0000085201
Responsible Attorney: Daniel Salinas

GE Litigation

For Professional Services through February 28, 2019 in connection with representation of Contrarian Capital Management, L.L.C. (the "Client"), on behalf of certain managed funds and accounts, in connection with the research and analysis of limited issues related to the Client's holding of bonds issued by Petróleos de Venezuela, S.A., as set forth in the Scope of Engagement section of the Engagement Letter dated August 8, 2017 executed by and between Daniel Salinas-Serrano, Partner of Quinn Emanuel Urquhart & Sullivan, LLP and Gina N. Scianni, General Counsel of Contrarian Capital Management, L.L.C.

Fees	\$229,843.00
Expenses	<u>\$2,968.10</u>
Total Due This Invoice	\$232,811.10
Balance Due from Previous Statement(s)	\$0.01
Total Balance Due	<u>\$232,811.11</u>

Retainer Summary

Retainer to be Maintained:\$0.00
Current Retainer Balance:\$0.00
Retainer Amount Due:\$0.00

Total Balance Due..... \$232,811.11

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March 21, 2019

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Matter #: 07246-00002A

Invoice Number: 101-0000085201

Statement Detail

Date	Timekeeper	Description	Hours
02/01/19	VN1	Analyze issues re [REDACTED] ACP/AWP draft correspondence re same; correspond with working group re same; research re same.	6.60
02/01/19	SAB	Emails with QE team re: various strategic issues.	0.40
02/01/19	DS2	Discussion with V. Noskov re [REDACTED] ACP/AWP [REDACTED] ACP/AWP Revise response to client re same; Discussion with team re GE litigation and [REDACTED] ACP/AWP [REDACTED] ACP/AWP [REDACTED] ACP/AWP Correspondence with leads re same; Review latest [REDACTED] ACP/AWP [REDACTED] ACP/AWP Analyze implications on GE litigation and [REDACTED] ACP/AWP strategies; Discussion with team re same; Correspondence with P. Harrell and client re same.	6.00
02/02/19	DS2	Further study of [REDACTED] ACP/AWP Correspondence with D. Pulecio re same; Call with P. Harrell re same; Call with D. Pulecio re same	3.00
02/03/19	DS2	Review [REDACTED] ACP/AWP [REDACTED] ACP/AWP Correspondence with client re same; [REDACTED] ACP/AWP [REDACTED] ACP/AWP Correspondence with firm resources re same.	2.00
02/04/19	VN1	Review [REDACTED] ACP/AWP review [REDACTED] ACP/AWP [REDACTED] ACP/AWP and analyze same; review enforcement pleadings; research re Venezuela and PDVSA enforcement; review articles re [REDACTED] ACP/AWP review past correspondence and research re same.	5.90
02/04/19	DS2	[REDACTED] ACP/AWP Correspondence with client re [REDACTED] ACP/AWP and relevant institutions and laws; Review analysis of possible [REDACTED] ACP/AWP [REDACTED] ACP/AWP Correspondence with client re same; Consider impact on GE claim and enforcement.	3.50
02/05/19	VN1	Prepare for and attend telephone conference with working group and client re status and strategy; research re same.	4.60
02/05/19	SAB	Call with clients; emails with QE team; review intel on Venezuela.	0.90
02/05/19	DS2	Further analysis of litigation and execution strategy in light of [REDACTED] ACP/AWP [REDACTED] ACP/AWP Call with team re	4.50

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March 21, 2019

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Matter #: 07246-00002A

Invoice Number: 101-0000085201

Date	Timekeeper	Description	Hours
		same; Prepare for call with client re same; Call with client re same.	
02/05/19	AD5	TC with DSS, NV, X. Song, P. Harrell, J. Weisser regarding litigation strategy.	0.70
02/06/19	VN1	Review ACP/AWP documents; correspond with working group re same; review and revise 3213 papers; review ACP/AWP review ACP/AWP	6.20
02/06/19	DS2	Analyze latest developments in ACP/AWP Correspondence with client and team re same; Analyze reports of ACP/AWP Review client notes re call on impact of ACP/AWP Discussion with team re strategy considerations of ACP/AWP ACP/AWP	4.00
02/06/19	SAB	ACP/AWP emails with QE team and clients.	0.50
02/06/19	AD5	Emails with VN re enforcement papers for GE notes.	0.20
02/07/19	VN1	Review and revise 3213 papers; correspond with working group re same; correspond with A. Deknatel re ACP/AWP evidence; review 3213 documents and review other dockets.	5.50
02/07/19	DS2	Review PDVSA reply brief in Crystallex appeal; Initial review of updated 3213 papers.	2.50
02/08/19	DS2	Further review and comment on updated 3213 filings.	2.00
02/11/19	VN1	Review 3213 motions and ancillary documents; correspond with working group re same; review ACP/AWP correspond with working group re same.	4.90
02/11/19	DS2	Study ACP/AWP Consider impact on strategy for GE litigation; Further review and revision of 3213 filings.	4.00
02/12/19	DS2	Further analysis of ACP/AWP ACP/AWP Consider impact on GE litigation strategy; Correspondence with client re same; Call with client re same; ACP/AWP Correspondence with client re impact of ACP/AWP ACP/AWP Correspondence with client re ACP/AWP	5.00
02/12/19	AD5	TC with DSS, VN, SAB, X. Song, J. Weisser, M. Ginnings; prepare notes from call.	0.70
02/12/19	VN1	Telephone conference with client and working group re various open issues; review documents re same; draft analysis	6.80

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March 21, 2019
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Matter #: 07246-00002A
Invoice Number: 101-0000085201

Date	Timekeeper	Description	Hours
		re same; telephone conference with D. Salinas re same; review issues re ACP/AWP	
02/12/19	SAB	Emails with QE team re: various issues; review intel on Venezuela.	0.30
02/13/19	AD5	Review and revise notices and summons for notes and credit action; emails with NV regarding timing of service and return date.	1.20
02/13/19	DS2	Final review and comments on updated 3213 drafts; Correspondence with team re same; Discussion with team re filing mechanics; Review coverage of ACP/AWP ACP/AWP Correspondence with clients re same; Review ACP/AWP ACP/AWP Review coverage of ACP/AWP Review ACP/AWP Correspondence with client re same and impact on GE strategy.	8.00
02/13/19	VN1	Prepare papers for GE suit; correspond with local counsel re same; research re same; correspond with working group re same.	9.90
02/13/19	SAB	Emails with OE team and client re: various issues; review ACP/AWP	0.80
02/14/19	AD5	Review and revise notices and summons for notes and credit actions; emails with NV regarding notices and summons; emails with Managing Clerk's office regarding filing logistics; emails with J. Cohen regarding summons and notices and filing logistics; TC with J. Cohen, M. Zauruder, DSS, VN regarding litigation filing strategy; prepare email for SAB summarizing strategy call; TC with DSS, VN, SAB regarding litigation strategy; cite and record check memoranda of law for note and credit actions.	8.50
02/14/19	DS2	Discussion with team re implementation of edits and comments; Call with V. Noskov re same; Final additional edits to 3213 papers; Correspondence with client re same; Review ACP/AWP ACP/AWP ACP/AWP Discussion with team re initial client comments on 3213 filings; Implement same; Correspondence with client re same; Oversee preparations for filing 3213s tomorrow; Call with J. Cohen and M. Zauderer re filing strategy and mechanics; Internal team call re same; Correspondence with client re procedure and hearing after filing.	9.50
02/14/19	VN1	Prepare papers for GE suit; correspond with local counsel re	12.90

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March 21, 2019

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Matter #: 07246-00002A

Invoice Number: 101-0000085201

Date	Timekeeper	Description	Hours
		same; research re same; correspond with working group re same.	
02/14/19	SAB	Emails and calls with QE team re: various issues.	1.40
02/15/19	AD5	Complete cite and record check of memoranda of law in support of notes and credit actions; emails with VN re register for credit agreement action; finalize RJIs; finalize exhibits for credit and notes agreements; coordinate table of contents for memoranda of law in support of notes and credit actions; emails with managing clerks office regarding affidavit signature, exhibits, RJIs, final case papers, and filing logistics.	10.20
02/15/19	PS3	Extensive emailing and document review with associates in anticipation of filings; named, saved, printed and e-filed first motion for summary judgment in lieu of complaint with all supporting documents and RJI with addendum at New York County Supreme.	2.00
02/15/19	DS2	Final edits and polishing of 3213 filings; Correspondence with team re same; Supervise filing same; Review ACP/AWP ACP/AWP	7.00
02/15/19	VN1	Prepare papers for GE suit; correspond with local counsel re same; research re same; correspond with working group re same; analyze issues re ACP/AWP	14.80
02/15/19	SAB	Emails and calls with QE team re: various issues.	0.60
02/17/19	DS2	ACP/AWP ACP/AWP ACP/AWP correspondence with client re same	1.00
02/17/19	VN1	Research re ACP/AWP and other issues.	2.30
02/18/19	VN1	Correspond with working group re service of summons and motion; correspond with local counsel re same; review summons; review documents re service; ACP/AWP ACP/AWP	2.10
02/19/19	AD5	Coordinate printing of motions for summary judgment and service of process on PDVSA and Petroleo; prepare notices of commencement; emails with VN and Managing Clerk's Office; emails with VN regarding other enforcement actions against Venezuela and PDVSA.	4.80
02/19/19	PS3	Assisted in printing and preparing as filed motion for summary judgment in lieu of complaint, with all supporting documents, for services by hand upon defendants by their registered agents in NYC.	1.00

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March 21, 2019

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Matter #: 07246-00002A

Invoice Number: 101-0000085201

Date	Timekeeper	Description	Hours
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Not Claimed**Not Claimed**

02/19/19	SAB	Emails with QE team re: various issues; review ACP/AWP	0.80
02/20/19	DS2	Discussion with V. Noskov re service and courtesy notice to Arnold and Porter per client instructions; Correspondence with client re same; Review press coverage of GE action	2.50
02/20/19	AD5	Coordinate printing of binders for SAB.	0.50
02/20/19	VN1	Correspond with working group re filing notices of appearance and affidavits of service; file same; review pro hac vice requirements; correspond with managing clerk's office re same.	5.60
02/21/19	PS3	Assisted new clerk to name, save, print and e-file notices of appearance and affidavits of service at New York County Supreme.	1.00
02/21/19	AD5	Prepare notices of appearance; emails with VN and PS re docketing of notices and affidavits of service; coordinate printing of supportive caselaw for SAB.	1.20
02/21/19	VN1	Correspond with managing clerk's office re filing notices of appearance; research re ACP/AWP correspond with working group re filings; correspond with S. Kirpalani re case and strategy; correspond with D. Salinas re same; correspond with local counsel ACP/AWP research re same; review docket for other actions; review and prepare documents to serve on opposing counsel.	7.90
02/22/19	SAB	Emails and calls with QE partners and Zauderer re: intel on Judge Masley; research on same; call with Bloomberg reporter; analysis of events relevant to lawsuit.	1.70
02/22/19	DS2	Discussions with team re judge assignment for Notes case; Research re assigned judge; Discussion with S. Broome re same; Correspondence re Bloomberg requests for comments about entity behind Red Tree; Research re judge assigned for	4.50

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March 21, 2019

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Matter #: 07246-00002A

Invoice Number: 101-0000085201

Date	Timekeeper	Description	Hours
		credit agreement case; Correspondence re same.	
02/22/19	VN1	Correspond with local counsel re pro hac vice application; correspond with same re judges assigned to case; research re same; correspond with working group re same; research re ACP/AWP	3.20
02/23/19	SAB	Call with M. Carlinsky re: Judge Cohen.	0.20
02/25/19	AD5	Research Davis Polk representation of PDVSA and Venezuela; research Rusoro motion by Maduro Venezuela attorneys.	0.50
02/25/19	SAB	Prepare summary of intel on assigned judges; call with M. Zauderer; emails with QE team and clients; review and analysis of filings and prepare talking points for hearing.	1.60
02/25/19	DS2	Correspondence with client and team re media links of Red Tree with Contrarian; Review ACP/AWP ACP/AWP Discussion with V. Noskov re same; Analyze final information/thoughts on judges assigned to notes and credit agreement cases; Correspondence with Arnold and Porter re courtesy notice of 3213 motions filed against PDVSA and Petróleo; Review Rusoro filing by Venable on behalf of Maduro's PDVSA; Correspondence with team re same.	4.00
02/25/19	VN1	Prepare for and attend office conference with S. Kirpalani re case strategy and ACP/AWP research re same; review notes re assigned judges; correspond with D. Salinas re serving opposing counsel; review Rusoro filings re Venezuela and PDVSA counsel.	6.10
02/26/19	VN1	Correspond with working group and local counsel re judges assigned; research re ACP/AWP	2.10
02/26/19	DS2	Call with contrarian investor re litigation strategy; Correspondence with client re judge assignments; Correspondence with team and Zauderer team re same; Correspondence with client re ACP/AWP and potential implications for GE litigation	4.50
02/27/19	SAB	Cal with QE team and Zauderer re: assigned judges and ACP/AWP call with clients re: same; review ACP/AWP emails with QE team re: various issues.	2.00
02/27/19	VN1	Telephone conference with working group and local counsel re judges; correspond with working group re same; telephone conference with client re same; research re ACP/AWP issues; review New York state rules of procedure.	5.20

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Invoice Number: 101-0000085201

Date	Timekeeper	Description	Hours
02/27/19	DS2	Prepare for client call; Call with Zauderer team re judge assignments and possible consolidation strategy; Call with client re same; Review Dresser-Rand filing against PDVSA	5.00
02/28/19	VN1	Research re ACP/AWP review case law re same.	2.90

Not Claimed

Total Hours 258.40

Fee Summary

Attorneys	Init.	Title	Hours	Rate	Amount
Stephen A. Broome	SAB	Partner	11.20	1,000.00	11,200.00
Daniel Salinas	DS2	Partner	89.50	1,000.00	89,500.00
Victor Noskov	VN1	Associate	125.20	840.00	105,168.00
Anna Deknatel	AD5	Associate	28.50	790.00	22,515.00
Case Assistants	Init.	Title	Hours	Rate	Amount
Patricia Smith	PS3	Managing Clerk	4.00	365.00	1,460.00

Expense Summary

Description	Amount
Online Research	(based on standard Westlaw or Lexis, without any applicable discount) 2,734.94
Document Reproduction	0.24 per page based on market not cost 92.88
Word processing	39.00
Velobind	2.12
Off-site document services	99.16
Total Expenses	\$2,968.10

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Current Invoice Summary

Matter Name : GE Litigation

Matter #: 07246-00002A

Bill Date: March 21, 2019

Invoice Number: 101-

0000085201

Total Fees.....\$229,843.00

Expenses.....\$2,968.10

Total Due this Invoice.....\$232,811.10

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April 18, 2019

Josh Weisser
Corporate Distressed
Contrarian Capital Management, L.L.C.
41 West Putnam Avenue, Suite 425
Greenwich, CT 06830

Matter #: 07246-00002A
Invoice Number: 101-0000086335
Responsible Attorney: Daniel Salinas

GE Litigation

For Professional Services through March 31, 2019 in connection with representation of Contrarian Capital Management, L.L.C. (the "Client"), on behalf of certain managed funds and accounts, in connection with the research and analysis of limited issues related to the Client's holding of bonds issued by Petróleos de Venezuela, S.A., as set forth in the Scope of Engagement section of the Engagement Letter dated August 8, 2017 executed by and between Daniel Salinas-Serrano, Partner of Quinn Emanuel Urquhart & Sullivan, LLP and Gina N. Scianni, General Counsel of Contrarian Capital Management, L.L.C.

Fees	\$232,677.00
Expenses	<u>\$16,454.73</u>
Total Due This Invoice	\$249,131.73 ✓
Balance Due from Previous Statement(s)	\$33,045.34
Total Balance Due	<u>\$282,177.07</u>

Retainer Summary

Retainer to be Maintained: \$0.00
Current Retainer Balance: \$0.00
Retainer Amount Due: \$0.00

Total Balance Due..... \$282,177.07

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April 18, 2019
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Matter #: 07246-00002A
Invoice Number: 101-0000086335

Statement Detail

Date	Timekeeper	Description	Hours
03/01/19	VN1	Review articles re PDVSA; correspond with working group re same.	0.40
03/04/19	VN1	Review notice of rejection of service; correspond with working group re same; research re same; review governing documents re same; correspond with local counsel re same; review other dockets re same.	5.10
03/04/19	DS2	Review correspondence from agent CSC [REDACTED] ACP/AWP Discussion and correspondence with team re strategy in [REDACTED] ACP/AWP	2.50
03/04/19	AD5	Emails with DSS, SAB, VN regarding [REDACTED] ACP/AWP [REDACTED] ACP/AWP	0.50
03/05/19	VN1	Telephone conference with client and working group re strategy and next steps; review issues re [REDACTED] ACP/AWP [REDACTED] ACP/AWP telephone conference with CSC [REDACTED] ACP/AWP correspond with working group re same; telephone conference with local counsel re [REDACTED] ACP/AWP and next steps.	5.60
03/05/19	DS2	Discussion with team re [REDACTED] ACP/AWP [REDACTED] ACP/AWP Call with Zauderer re same; Review [REDACTED] ACP/AWP [REDACTED] ACP/AWP Correspondence with team re same.	3.00
03/05/19	AD5	TC with DSS, NV, M. Ginnings, X. Song, J. Weisser regarding Venezuela meeting strategy; TC with J. Cohen regarding [REDACTED] ACP/AWP [REDACTED] ACP/AWP TC with DSS, SAB, M. Ginnings, X. Song, J. Weisser regarding Venezuela meeting; TC with VN, J. Cohen, M. Zauruder regarding [REDACTED] ACP/AWP [REDACTED] ACP/AWP	1.90
03/05/19	SAB	Emails and calls with QE team and clients re: various issues.	0.80
03/06/19	VN1	Telephone conference with CSC re [REDACTED] ACP/AWP correspond with working group re same; research re same.	2.50
03/06/19	DS2	Further discussion with team re [REDACTED] ACP/AWP Consider strategy of [REDACTED] ACP/AWP Analyze research re same.	2.00
03/07/19	VN1	Research re [REDACTED] ACP/AWP correspond with working group re same; draft correspondence re same; correspond with working group re [REDACTED] ACP/AWP [REDACTED] ACP/AWP	8.80
03/07/19	DS2	Further discussion with team re [REDACTED] ACP/AWP [REDACTED] ACP/AWP Discussion about research re same; Correspondence	1.50

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April 18, 2019
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Matter #: 07246-00002A
Invoice Number: 101-0000086335

Date	Timekeeper	Description	Hours
		with client re ACP/AWP Discussion with team re same.	
03/07/19	SAB	Emails with QE team, GS, and clients re: various issues.	0.40
03/08/19	VN1	Draft correspondence re service of process; correspond with working group re same; review ACP/AWP materials; correspond with client re same.	7.90
03/08/19	DS2	Discussion with team re courtesy notice of filing on known PDVSA/Vene counsel; Initial review of ACP/AWP ACP/AWP Correspondence with P. Harrell re same.	2.00
03/11/19	VN1	Correspond with local counsel re ACP/AWP review issues re same; research re same; telephone conference with local counsel re same; draft correspondence to client re open issues.	8.80
03/11/19	DS2	Review and revise ACP/AWP ACP/AWP Correspondence with P. Harrell re same; Discussion with team re ACP/AWP and related papers; Review ACP/AWP ACP/AWP Correspondence with client and team re same.	4.20
03/11/19	AD5	Legal research regarding ACP/AWP	0.30
03/12/19	VN1	Correspond with local counsel re ACP/AWP review issues re same; correspond with working group re same; draft correspondence re next steps; telephone conference with D. Salinas re ACP/AWP	4.30
03/12/19	DS2	Consider strategy re ACP/AWP ACP/AWP Discussions with team re same; Discussion and correspondence with M. Zauderer re same; Correspondence with client re same.	4.50
03/13/19	DS2	Review ACP/AWP Discussion with team re ACP/AWP Correspondence with client re same.	2.50
03/13/19	VN1	Revise ACP/AWP memorandum; correspond with working group re reach-out from other creditor group; analyze issues re ACP/AWP	3.80
03/13/19	SAB	Emails with QE team and GS re: various issues.	0.30
03/14/19	VN1	ACP/AWP correspond with local counsel re same; research re same.	8.50

Not Claimed

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Matter #: 07246-00002A
Invoice Number: 101-0000086335

Date	Timekeeper	Description	Hours
03/15/19	VN1	ACP/AWP research re same; correspond with working group re same.	7.50
03/16/19	VN1	Revise ACP/AWP	2.10
03/17/19	DS2	Review and revise ACP/AWP ACP/AWP Correspondence with V. Noskov re same; Correspondence with Zauderer team re same.	3.00
03/17/19	VN1	Revise ACP/AWP correspond with working group re same.	3.90
03/17/19	SAB	Emails with QE team; review and revise ACP/AWP	1.20
03/18/19	DS2	Discussion with team re process on return date; Correspondence with client re same; Further review of ACP/AWP ACP/AWP Discussion with team re same; Correspondence with client re same	6.00
03/18/19	VN1	Revise ACP/AWP correspond with working group re same; telephone conference with same re same; review ACP/AWP ACP/AWP correspond with working group re same.	5.90
03/19/19	DS2	Correspondence with client re comments on ACP/AWP Discussion with team re same; Further revision of ACP/AWP ACP/AWP	2.00
03/19/19	VN1	Correspond with working group re return date and logistics; revise ACP/AWP correspond with working group re same.	3.40
03/19/19	SAB	Emails with QE team, client and GS, re: various issues	0.60
03/20/19	DS2	Discussion with client and team re strategy moving forward in light of ACP/AWP Discussion with V. Noskov and A. Deknatel re strategy ACP/AWP ACP/AWP Call with representative of Guaido Attorney General re possible need for stay.	7.00
03/20/19	VN1	Correspond with working group re return date; correspond with local counsel re ACP/AWP revise same; review ACP/AWP ACP/AWP correspond with working group re same; address urgent questions re meeting; telephone conference with D. Salinas re strategy and next steps.	8.20
03/20/19	SAB	Emails with QE team re: various issues.	0.40
03/21/19	DS2	Discussion with V. Noskov re update from return date at courthouse; Discussion with team re ACP/AWP Discussion with V. Noskov re ACP/AWP	9.50

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Matter #: 07246-00002A
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Date	Timekeeper	Description	Hours
		ACP/AWP Analyze notices of removal; Discussion with team re same and strategy ACP/AWP Call with J. Weisser re latest developments; Correspondence with client re strategic considerations ACP/AWP Analyze ACP/AWP Discussion with team re same and ACP/AWP Review ACP/AWP Discussion with team re same; Discussion with partners re Hogan Lovells attorneys representing defendants; Correspondence from P. Harrell re ACP/AWP	
03/21/19	VN1	Attend court for return date; correspond with working group re same; ACP/AWP per same; review notice of removal; correspond with working group re same; research re same; research ACP/AWP	8.00
03/21/19	SAB	Review removal papers; emails with QE team re: strategy.	0.70
03/22/19	VN1	Review Red Tree docket re judge assignment; correspond with working group re same; research ACP/AWP review correspondence re same.	5.70
03/22/19	AD5	Legal research regarding ACP/AWP prepare summary chart of ACP/AWP	3.80
03/22/19	DS2	Further discussion with team strategy and research re ACP/AWP ACP/AWP Correspondence with team re judge assignment; Further analysis of ACP/AWP ACP/AWP Further discussion with team re same and impact on ACP/AWP	3.00
03/24/19	VN1	Review remand research; correspond with working group re same.	1.30
03/24/19	AD5	Legal research regarding ACP/AWP ACP/AWP prepare summary of case law.	3.50
03/25/19	VN1	Correspond with working group re notices of appearance; correspond with same re case deadlines; review local rules; review ACP/AWP research re same.	5.20
03/25/19	AD5	Prepare notices of appearance for SK, SAB, NV for Southern District; TC with DSS, NV, X. Song, M. Ginnings, J. Weisser regarding litigation strategy.	2.50
03/25/19	DS2	PDVSA strategy call with client and P. Harrell; Discussion with team re same and strategy moving forward.	1.50
03/26/19	VN1	Correspond with managing clerk re notices of appearance; research ACP/AWP draft analysis re same; correspond with	2.50

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Date	Timekeeper	Description	Hours
		working group re same.	
03/26/19	SAB	Emails with QE team re: various issues; analysis of [REDACTED] ACP/AWP issues.	0.80
03/26/19	DS2	Correspondence with team re [REDACTED] ACP/AWP Consider [REDACTED] ACP/AWP ACP/AWP	2.50
03/27/19	PS3	Named, saved, printed and e-filed six notices of appearances at SDNY in two Red Tree actions.	1.00
03/27/19	VN1	Research re [REDACTED] ACP/AWP draft analysis re same; correspond and telephone conference with working group re same; file notices of appearance; draft client correspondence re motion to stay proceeding and opposition; draft same.	6.50
03/27/19	AD5	Research regarding [REDACTED] ACP/AWP [REDACTED] ACP/AWP emails with DSS, SAB, NV; TC with DSS, NV, X. Song, J. Weisser, M. Ginnings; prepare cases for email to DSS and SAB; prepare notices of appearance for SAB, NV; emails with SAB, NV, and managing clerks office to coordinate filing of notices of appearance.	5.80
03/27/19	SAB	Analysis of [REDACTED] ACP/AWP review PDVSA motion for stay; call with QE team.	2.10
03/27/19	DS2	Review and analyze motion to stay; Discussion with team re same; Correspondence with client re same; Further analysis/consideration of strategy in light of defendants' removal; Discussion with team re same; Analyze research re same; Correspondence with client re same.	5.00
03/28/19	VN1	Draft opposition to motion for stay; research re same; correspond with working group re same; research re 3213 motion upon removal; research re [REDACTED] ACP/AWP	8.40
03/28/19	AD5	Legal research regarding [REDACTED] ACP/AWP [REDACTED] ACP/AWP prepare email summary to DSS, SAB, NV; prepare pro hac vice applications for D. Salinas; emails with NV regarding [REDACTED] ACP/AWP	5.20
03/28/19	DS2	Further analysis of motion for stay; Discussion with team re same; Analyze research re same; Review coverage of latest [REDACTED] ACP/AWP	4.50
03/28/19	SAB	Emails with QE team re: Various issues; revise opposition to stay motion.	0.60
03/29/19	VN1	Prepare opposition to motion for stay; research re same; draft same; correspond with working group re same; prepare same	11.90

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Date	Timekeeper	Description	Hours
		for filing and file; telephone conference with Dresser counsel re cases.	
03/29/19	AD5	Prepare pro hac vice application for D. Salinas; coordinate pro hac application with managing clerk's office; emails with DSS, SAB, VN regarding removed action.	1.40
03/29/19	DS2	Call with V. Noskov re [REDACTED] ACP/AWP [REDACTED] ACP/AWP Call with Dresser Rand counsel; Coordination re pro hac application; Work on opposition to defendants' motion for stay; Discussions with team re same; Supervise filing of same; Review letter re stay in Dresser Rand case.	10.00
03/29/19	SAB	Emails and calls with QE team re: various issues; review opposition to motion to stay.	1.90
03/30/19	VN1	Prepare letter to court requesting status conference; research re same.	2.10
03/30/19	AD5	Research and prepare summary of representation for Venezuela and related parties in active litigation.	2.70
03/30/19	SAB	Emails with QE team re: various issues.	0.40
03/31/19	VN1	[REDACTED] ACP/AWP [REDACTED] ACP/AWP	2.90
03/31/19	DS2	[REDACTED] ACP/AWP [REDACTED] ACP/AWP Analyze research re same.	2.50
Total Hours			261.70

Fee Summary

Attorneys	Init.	Title	Hours	Rate	Amount
Stephen A. Broome	SAB	Partner	10.20	1,000.00	10,200.00
Daniel Salinas	DS2	Partner	81.70	1,000.00	81,700.00
Victor Noskov	VN1	Associate	141.20	840.00	118,608.00
Anna Deknatel	AD5	Associate	27.60	790.00	21,804.00
Case Assistants	Init.	Title	Hours	Rate	Amount
Patricia Smith	PS3	Managing Clerk	1.00	365.00	365.00

Expense Summary

Description	Amount
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Description	Amount
Attorney service	580.00
Outside record production	64.96
Online Research (based on standard Westlaw or Lexis, without any applicable discount)	15,809.77
Total Expenses	\$16,454.73

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Current Invoice Summary

Matter Name : GE Litigation

Matter #: 07246-00002A
Bill Date: April 18, 2019
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Total Fees.....\$232,677.00
Expenses.....\$16,454.73
Total Due this Invoice.....\$249,131.73

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May 17, 2019

Josh Weisser
Corporate Distressed
Contrarian Capital Management, L.L.C.
41 West Putnam Avenue, Suite 425
Greenwich, CT 06830

Matter #: 07246-00002A
Invoice Number: 101-0000087618
Responsible Attorney: Daniel Salinas

GE Litigation

For Professional Services through April 30, 2019 in connection with representation of Contrarian Capital Management, L.L.C. (the "Client"), on behalf of certain managed funds and accounts, in connection with the research and analysis of limited issues related to the Client's holding of bonds issued by Petróleos de Venezuela, S.A., as set forth in the Scope of Engagement section of the Engagement Letter dated August 8, 2017 executed by and between Daniel Salinas-Serrano, Partner of Quinn Emanuel Urquhart & Sullivan, LLP and Gina N. Scianni, General Counsel of Contrarian Capital Management, L.L.C.

Fees	\$161,283.50
Expenses	<u>\$8,957.71</u>
Total Due This Invoice	\$170,241.21
Balance Due from Previous Statement(s)	\$35,361.90
Total Balance Due	<u>\$205,603.11</u>

Retainer Summary

Retainer to be Maintained:\$0.00
Current Retainer Balance:\$0.00
Retainer Amount Due:\$0.00

Total Balance Due..... \$205,603.11 (X)

Confidential – May include attorney-client privileged and work-product information

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quinn emanuel trial lawyersMay 17, 2019
Page 2Matter #: 07246-00002A
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Date	Timekeeper	Description	Hours
04/01/19	EP	Filed disclosure statements in notes and credit actions for victor noskov.	1.00
04/01/19	DS2	Analyze questions re [REDACTED] ACP/AWP Discussion with V. Noskov re same; Analyze research re same; Correspondence with client re same; Discussion with team re assignment of Magistrate Netburn to case; Correspondence with NY Partners re MJ Netburn; Review and revise draft letter to court requesting status conference; Discussio with team re strategy for same.	6.50
04/01/19	SAB	Review filings and emails with QE team re: various issues.	0.60
04/01/19	AD5	Prepare 7.1 Disclosure Statements; emails with VN, DSS regarding statements and filing timeline; emails with managing clerks office regarding service question and filing of statements; revise affidavit for DSS pro hac application.	1.10
04/01/19	VN1	Research re [REDACTED] ACP/AWP correspond with working group re Friday filing; research re [REDACTED] ACP/AWP correspond with working group re same; review draft of same; file same; review docket; correspond with working group re developments in case; research re [REDACTED] ACP/AWP correspond with working group re same; draft letter requesting status conference; correspond with working group re same; correspond with client re [REDACTED] ACP/AWP	10.90
04/02/19	PS3	Telephone conferences with attorneys and then with Judge's deputy clerk re: judge's availability for conference.	0.50
04/02/19	DS2	Call with V. Noskov re strategy for [REDACTED] ACP/AWP [REDACTED] ACP/AWP Call with S. Broome and V. Noskov re same; Analyze research and strategic considerations re same; Correspondence with team re same.	4.50
04/02/19	SAB	Calls and emails with QE team re: various issues.	1.30
04/02/19	VN1	Analyze issues re filing; correspond with working group re same; review letter requesting conference; telephone conference re same; correspond with managing clerk re timing of status conference; analyze issues re same; correspond with working group re same; research re re-noticing; correspond with working group re same.	5.80
04/03/19	DS2	Discussion with V. Noskov re strategy for moving case along including [REDACTED] ACP/AWP Correspondence with team re Judge	3.00

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Date	Timekeeper	Description	Hours
		Nathan's rules re same; Review research re same.	
04/03/19	SAB	Analysis of various legal/procedural issues and emails with QE team re: same.	0.60
04/03/19	VN1	Research issues re ACP/AWP analyze strategy re same; correspond with working group re same; prepare pro hac vice application for D. Salinas.	4.50
04/03/19	AD5	Research regarding Judge Nathan's rule regarding conferences; legal research regarding ACP/AWP email to VN, DSS, SAB regarding research; revise DSS pro hac application; coordinate with managing clerk's office regarding filing of pro hac application.	3.90
04/04/19	DS2	Call with V. Noskov and S. Broome re strategy to move case forward including ACP/AWP Review and revise letter requesting conference; Discussion with team re same; Correspondence with client re same.	3.00
04/04/19	SAB	Emails and calls with QE team re: strategy issues; draft letter to court.	2.20
04/04/19	VN1	Correspond with working group re ACP/AWP and letter requesting conference; telephone conference with same re same; analyze re-noticing issues; revise letter requesting conference.	4.90
04/05/19	EJ	Submission of Courtesy copies of Motion for Admission Pro Hac Vice for Daniel Salinas-Serrano to Justice Nathan USDC SDNY.	1.00
04/05/19	SAB	Review and analysis of Defendant's reply memo; emails with QE team re: same.	0.40
04/05/19	VN1	Review and analyze Defendants' reply re stay motion; correspond with working group re same; draft correspondence to client re same.	5.20
04/05/19	DS2	Analyze reply in support of stay request; Discussion with team re same and changes to letter requesting conference in light of reply arguments; Correspondence with client re same.	4.00
04/06/19	VN1	Prepare re-noticing papers.	1.00
04/07/19	VN1	Revise letter requesting conference.	3.10
04/08/19	DS2	Further review and revision of draft letter to court requesting status conference ahead of ruling on stay request; Discussion with team re same; Discussion with team re ACP/AWP	3.50

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Date	Timekeeper	Description	Hours
		ACP/AWP and implications for our case.	
04/08/19	SAB	Revise letter to Nathan; emails with QE team re: various issues.	1.10
04/08/19	VN1	Revise letter requesting conference; correspond with working group re same; prepare re-noticing papers; research re same; correspond with working group re same; revise letter; correspond with working group re same; review ACP/AWP ACP/AWP analyze same; correspond with working group re same.	10.90
04/09/19	EJ	Correspondence with Attorney and Filed Letter Motion requesting Status Conference in both related actions addressed to Justice Nathan USDC SDNY.	1.00
04/09/19	DS2	Analyze client questions ACP/AWP Prepare response re same; Discussion with team re same; Further review and revision to memorandum of law in support of msj and related materials; Discussion with team re same; Final review and revisions to letter requesting conference.	6.00
04/09/19	SAB	Emails with QE team re: various strategy issues.	0.40
04/09/19	VN1	Draft re-noticing papers; research re same; correspond with working group re same; revise letter requesting status conference; correspond with working group re same; research re same; prepare same for filing; review issues ACP/AWP ACP/AWP correspond with working group re same.	12.80
04/10/19	DS2	Review and revise 56.1 statement in support of re-filed msj; Discussion with V. Noskov re potential arguments in opposition to prolonged stay.	2.50
04/10/19	PS3	Extensive back and forth with associate, discussing procedures, timing, fees, mechanics of filing two state court summary judgment motions in federal court (SDNY).	1.00
04/10/19	EJ	Submission of Courtesy copies of Letter Motions in both related actions to Justice Nathan USDC SDNY.	1.00
04/10/19	VN1	Prepare exhibits for filing; revise re-noticing papers; correspond with client and working group re same; research re same; telephone conference with D. Salinas re strategy and summary judgment posture; research re same; review related dockets; correspond with working group re same.	7.20
04/10/19	SAB	Emails with QE team re various issues; review reviewed pleadings.	0.40
04/11/19	VN1	Finalize re-noticing papers; correspond with working group re same; telephone conference with same re same; arrange for	9.10

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Date	Timekeeper	Description	Hours
		filing; review related case dockets; correspond with D. Salinas re same.	
04/11/19	DS2	Discussion with team re ACP/AWP ACP/AWP Review research re same; Final review and revision of re-filed MSJ materials; Correspondence with V. Noskov re same.	2.50
04/11/19	EJ	Correspondence with Attorney and Filed Motion for Summary Judgment, Memorandum in Support, Declaration with Exhibits and Rule 56.1 Statement in USDC SDNY.	2.00
04/11/19	AD5	Legal research regarding ACP/AWP emails to VN, DSS, SAB regarding research; review and revise summary judgment briefs and notices; coordinate filing of summary judgment papers with managing clerk's office.	6.50
04/12/19	VN1	Review filings; correspond with client re same; correspond with working group re same; review Defendants' response letter; correspond with clients re same.	2.60
04/12/19	DS2	Analyze letter response from defendants re status conference; Discussion with team re same.	1.00
04/12/19	AD5	Emails with NV, DSS, SAB regarding defendants' status conference letter.	0.80
04/15/19	VN1	Review related case dockets; correspond with working group re same.	1.50
04/16/19	VN1	Correspond with working group re order in our court; analyze same; correspond with client re same.	2.20
04/17/19	VN1	Review client questions; research re same; draft analysis re same.	4.10
04/18/19	VN1	Review client questions; research re same; draft analysis re same; review ACP/AWP correspond with working group re same.	4.10
04/18/19	AD5	Review and summarize ACP/AWP ACP/AWP emails with VN, DSS, SAB.	0.60
04/18/19	DS2	Discussion with team re ACP/AWP and implications for our case.	1.50
04/19/19	AD5	Email X. Song, J. Weisser, M. Ginnings, DSS, NV, SAB regarding order entered in Red Tree matter.	0.30
04/19/19	DS2	Correspondence with team re court orders on request for conference and discussion re impact on stay motion; Review and discussion re ACP/AWP	2.50

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Date	Timekeeper	Description	Hours
04/26/19	AD5	Review other enforcement actions for stay motions, timelines, and opposition and prepare summary chart; prepare template letter for response to PDVSA.	1.40
04/26/19	DS2	Analyze [REDACTED] ACP/AWP [REDACTED] Discussion with team re implications and possible strategic opportunities for Red Tree case; Correspondence with client re same; Review and revise draft letter to opposing counsel re same; Correspondence with client re same; Finalize and send same to opposing counsel; Discussion with V. Noskov re [REDACTED] ACP/AWP [REDACTED]	0.50
04/26/19	VN1	Correspond with working group re [REDACTED] ACP/AWP [REDACTED] analyze same; draft letter re same; correspond with working group re same; review prior analysis re stay requests.	5.50
04/29/19	DS2	Correspondence with client re follow up with opposing counsel; Review opposing counsel response re action on the motion for summary judgment; Discussion with team re same and potential letter to court; Correspondence with client re same.	6.00
04/29/19	VN1	Draft letter to court re stay motion; correspond with working group re same; research re same.	7.10
04/29/19	AD5	Emails with VN and DSS regarding response letter on stay request; research [REDACTED] ACP/AWP [REDACTED] research [REDACTED] ACP/AWP [REDACTED] review and revise letter with information on other enforcement actions.	2.20
04/30/19	DS2	Review and revise draft letter to court re defendant's ability to respond to msj; Further discussion with team re advisability of filing.	2.00
04/30/19	VN1	Revise letter to court re stay motion; correspond with working group re same.	4.10
Total Hours			186.90

Fee Summary

Attorneys	Init.	Title	Hours	Rate	Amount
Stephen A. Broome	SAB	Partner	7.00	1,000.00	7,000.00
Daniel Salinas	DS2	Partner	49.00	1,000.00	49,000.00

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Victor Noskov	VN1	Associate	106.60	840.00	89,544.00
Anna Deknatel	AD5	Associate	16.80	790.00	13,272.00
Case Assistants	Init.	Title	Hours	Rate	Amount
Patricia Smith	PS3	Managing Clerk	1.50	365.00	547.50
Eric Passaglia	EP	Paralegal	1.00	320.00	320.00
Edward Juhn	EJ	Paralegal	5.00	320.00	1,600.00

Expense Summary

Description	Amount
Filing fee	400.00
Online Research	(based on standard Westlaw or Lexis, without any applicable discount) 7,598.40
Document Reproduction	0.24 per page based on market not cost 3.36
Travel	5.50
Word processing	54.00
Air travel	799.40
Certificate of good standing	75.00
Local meals	22.05
Total Expenses	\$8,957.71

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Current Invoice Summary

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0000087618

Total Fees.....\$161,283.50
Expenses.....\$8,957.71
Total Due this Invoice.....\$170,241.21

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June 19, 2019

Josh Weisser
Corporate Distressed
Contrarian Capital Management, L.L.C.
41 West Putnam Avenue, Suite 425
Greenwich, CT 06830

Matter #: 07246-00002A
Invoice Number: 101-0000088925
Responsible Attorney: Daniel Salinas

GE Litigation

For Professional Services through May 31, 2019 in connection with representation of Contrarian Capital Management, L.L.C. (the "Client"), on behalf of certain managed funds and accounts, in connection with the research and analysis of limited issues related to the Client's holding of bonds issued by Petróleos de Venezuela, S.A., as set forth in the Scope of Engagement section of the Engagement Letter dated August 8, 2017 executed by and between Daniel Salinas-Serrano, Partner of Quinn Emanuel Urquhart & Sullivan, LLP and Gina N. Scianni, General Counsel of Contrarian Capital Management, L.L.C.

Fees	\$44,609.00
Expenses	<u>\$116.75</u>
Total Due This Invoice	<u>\$44,725.75</u>

Confidential – May include attorney-client privileged and work-product information

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Matter #: 07246-00002A

Invoice Number: 101-0000088925

Statement Detail

Date	Timekeeper	Description	Hours
05/01/19	VN1	Review draft letter to court; correspond with working group re same; draft correspondence to client re same.	3.20
05/01/19	DS2	Review and revise letter to court re [REDACTED] ACP/AWP and effect on stay request here; Discussion with team re same; Correspondence with client re same and recommendation; [REDACTED] ACP/AWP Discuss with team effect of same on litigation strategy	4.50
05/02/19	DS2	Discussion with V. Noskov re [REDACTED] ACP/AWP and strategy re same; Discussion with V. Noskov re strategy [REDACTED] ACP/AWP Review and revise email to client re same; Correspondence with client re same.	1.50
05/03/19	VN1	Prepare for and attend Dresser-Rand hearing on motion to stay; draft correspondence re same.	3.70
05/03/19	DS2	Discussion with V. Noskov re [REDACTED] ACP/AWP [REDACTED] ACP/AWP Review and revise latest draft of letter; Discussion with P. Harrell re strategic consideration behind [REDACTED] ACP/AWP [REDACTED] ACP/AWP	3.00
05/06/19	VN1	Correspond with working group re letter to the court and other strategies re GE claim.	0.60
05/06/19	AD5	Prepare summary chart of [REDACTED] ACP/AWP emails with NV and DSS regarding [REDACTED] ACP/AWP	1.60
05/06/19	DS2	Review correspondence from P. Harrell re letter to court; Review correspondence from client re same; Discussion with team re same; Review order granting stay; Correspondence with client re same; Discussion with team re next steps and additional strategic possibilities; Review and revise stay tracking chart; Correspondence with client re same.	4.00
05/07/19	DS2	Discussion with partners [REDACTED] ACP/AWP Review prior memo re [REDACTED] ACP/AWP Correspondence with client re same; Study J. Cooper analysis re [REDACTED] ACP/AWP Consider potential [REDACTED] ACP/AWP Discussion with team re same; Further consideration of potential strategic alternatives in light of stay.	3.00

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Date	Timekeeper	Description	Hours
05/10/19	DS2	Further analysis and research into possible litigation options in light of stay.	1.00
05/16/19	VN1	Correspond with working group re telephone conference with client re next steps on GE claim; prepare for and attend telephone conference with working group re same.	1.10
05/16/19	SAB	Calls and emails with QE team re: strategy.	0.40
05/16/19	DS2	Further analysis of possible litigation strategies/alternatives in light of stay; Call with V. Noskov and S. Broome re same	3.00
05/17/19	AD5	Emails with ES, VN regarding removal and stay motions.	0.20
05/19/19	VN1	Prepare for and attend telephone conference re next steps re GE Claim.	1.10
05/19/19	DS2	Prepare for call with client re possible litigation strategies/alternatives in light of stay; Discussion with V. Noskov re same; Call with client re same	2.00
05/20/19	AD5	Prepare letter to Hogan Lovells regarding status of document access.	0.70
05/20/19	DS2	Discussion with team re strategy moving forward and tasks.	0.50
05/22/19	AD5	Search for stay motion models; emails with VN regarding stay motion models.	0.20
05/23/19	VN1	Draft correspondence to client re stay decision; correspond with working group re same.	1.10
05/23/19	DS2	Analyze [REDACTED] ACP/AWP Discussion with team re same; Draft email to client re same.	1.50
05/29/19	AD5	TC with VN regarding motion to vacate stay; legal research regarding 60(b) standard as applied to vacatur of stay.	2.20
05/30/19	AD5	Legal research on 60(b) standard as applied to vacatur of stay; prepare motion to vacate stay based on new facts.	2.20
05/31/19	DS2	Review correspondence from PDVSA to trustee re extension request; Analyze same in light of [REDACTED] ACP/AWP Discussion with team re same; Correspondence with client re same.	3.00
05/31/19	AD5	Legal research on 60(b) standard as applied to vacatur of stay; prepare motion to vacate stay based on new facts.	3.20
Total Hours			48.50

Fee Summary

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Attorneys	Init.	Title	Hours	Rate	Amount
Stephen A. Broome	SAB	Partner	0.40	1,000.00	400.00
Daniel Salinas	DS2	Partner	27.00	1,000.00	27,000.00
Victor Noskov	VN1	Associate	10.80	840.00	9,072.00
Anna Deknatel	AD5	Associate	10.30	790.00	8,137.00

Expense Summary

Description	Amount
Outside record production	79.59
Local business travel	37.16
Total Expenses	\$116.75

Quinn Emanuel trial lawyers
quinn.emanuel@quinnemanel.com

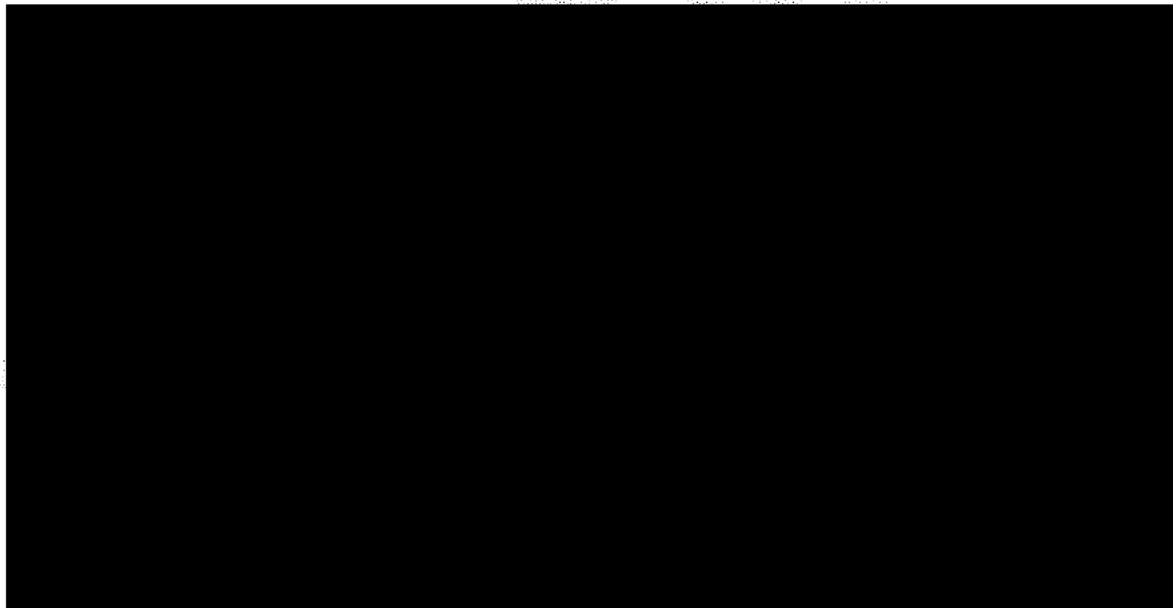
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